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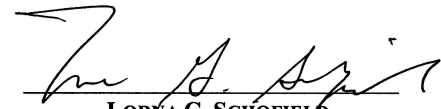
December 21, 2022

**BY ECF**

Honorable Lorna G. Schofield, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

The parties are reminded that the use of an alternative dispute resolution mechanism does not stay any discovery deadlines. They are further apprised that extensions of discovery are granted only upon a showing of compelling circumstances and diligence in completing discovery.

Dated: December 22, 2022  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: ***Karen Delgado v. 419 E. 70<sup>th</sup> Cafe, Inc., dba York Grill, et al.***  
Case No. 22 Civ. 7446 (LGS)

Dear Judge Schofield,

The parties respectfully provide this joint status report pursuant to the court's case management order, Section 13(a) (Docket 18) and the court's individual practices, Section IV(a).

The parties have scheduled mediation for Friday January 20<sup>th</sup>. The parties are informally exchanging positions and documents in advance. Plaintiff served Rule 26 Disclosure on December 19<sup>th</sup>. Defendants served Rule 26 Disclosure on December 21<sup>st</sup>, 2022.

Formal demands have not been served but should mediation not be successful, the parties will complete discovery on the schedule ordered by the court.

The plaintiff respectfully requests until January 31, 2023 to file a request for collective action certification of this FLSA case, if such motion is to be made at all. Defendants consent to this deadline.

The parties thank the court for its consideration of this case.

Respectfully submitted,

CILENTI & COOPER, PLLC

By: *Peter H. Cooper*

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